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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 IN RE: JUUL LABS, INC., MARKETING,  
SALES PRACTICES, AND PRODUCTS  
17 LIABILITY LITIGATION

**Case No. 19-md-02913-WHO**

18 THIS DOCUMENT RELATES TO:

19 *San Francisco Unified School District v.*  
20 *JUUL Labs, Inc., et al.*, Case No. 3:19-cv-  
08177-WHO  
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**DECLARATION OF MICHAEL J.  
GUZMAN IN SUPPORT OF THE  
NON-MANAGEMENT DIRECTOR  
DEFENDANTS' RESPONSE TO THE  
COURT'S JANUARY 28, 2025, ORDER**

1 I, MICHAEL J. GUZMAN, declare:

2 1. I am a partner at the law firm of Kellogg, Hansen, Todd, Figel & Frederick,  
3 P.L.L.C., and counsel to Defendants Nicholas Pritzker, Riaz Valani, and Hoyoung Huh  
4 (collectively, the “Non-Management Directors”). I am admitted to practice before this Court *pro*  
5 *hac vice*. I make this declaration based on my own personal knowledge. If called upon to testify,  
6 I could and would testify competently to the truth of the matters stated herein.  
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8 2. I submit this declaration in support of the Non-Management Directors’ Response to  
9 the Court’s January 28, 2025, Order, ECF No. 4374. The Non-Management Directors have  
10 redacted the highly sensitive personal information of third parties and confidential business  
11 information in accordance with the Order.

12 3. In addition to this Declaration, attached to the Response to the Court’s January 28,  
13 2025, Order are the following:  
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- 15 a. Attached as Exhibit A is a true and correct copy of the redacted version of  
16 Exhibit 24 to the Non-Management Director Defendants’ Motion for  
17 Summary Judgment Against San Francisco Unified School District, filed  
18 under seal at ECF No. 3385-1 and at ECF No. 3387-23;
- 19 b. Attached as Exhibit B is a true and correct copy of the redacted version of  
20 Exhibit 35 to the Non-Management Director Defendants’ Motion for  
21 Summary Judgment Against San Francisco Unified School District, filed  
22 under seal at ECF No. 3385-2 and at ECF No. 3387-37; and
- 23 c. Attached as Exhibit C is a true and correct copy of the redacted version of  
24 Exhibit 29 to the Non-Management Director Defendants’ Motion for  
25 Summary Judgment Against San Francisco Unified School District, filed  
26 under seal at ECF No. 3387-28.  
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th  
2 day of March 2025 in Washington, D.C.

3 /s/ Michael J. Guzman

4 Michael J. Guzman